

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

**VIA ECF AND OVERNIGHT MAIL**

March 13, 2018

The Honorable George B. Daniels  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Daniels:

The Plaintiffs Executive Committees ("PECs") write to advise the Court that the Consolidated Amended Complaint ("CAC") plaintiffs consent to and join in the *Ashton* plaintiffs' motion to include the documents filed at ECF No. 3930, Exh. 1 and Exh. 2, as part of the record concerning plaintiffs' oppositions (including the CAC plaintiffs' opposition) to the pending motions to dismiss of the Kingdom of Saudi Arabia.

The submitted documents corroborate and provide further evidentiary<sup>1</sup> support for the CAC plaintiffs' factual allegations, *see, e.g.*, CAC (ECF No. 3463) ¶¶ 42, 158(a)<sup>2</sup>-(b), 171, 249; the sworn affidavit opinions offered by the CAC plaintiffs' espionage expert, Michael Rochford, *see, e.g.*, Rochford Affidavit (ECF No. 3783, Exh. 6) at ¶¶ 10-11, 21-22, 41, 43-50; and the CAC plaintiffs' related legal arguments.

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<sup>1</sup> *See* Fed. R. Civ. P. 803(8).

<sup>2</sup> "[T]he Saudi government maintained a network of agents in the United States in the years preceding the 9/11 attacks, whose undisclosed functions involved performing activities on behalf of and at the direction of the Wahhabi clerics who populated the Islamic Affairs Offices of the Kingdom's embassies and consulates in the United States."

The Honorable George B. Daniels

March 13, 2018

P a g e 2

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Respectfully submitted,

MOTLEY RICE LLC

By: /s/ Robert T. Haefele  
ROBERT T. HAEFELE  
For the Plaintiffs' Exec. Committees

COZEN O'CONNOR

By: /s/ Sean P. Carter  
SEAN P. CARTER  
For the Plaintiffs' Exec. Committees

ANDERSON KILL P.C.

By: /s/ Jerry S. Goldman  
JERRY S. GOLDMAN  
For the Plaintiffs' Exec. Committees

cc: All Counsel of Record via ECF  
The Honorable Sarah Netburn (Via ECF & Federal Express)